

JOSHUA A. SLIKER, ESQ.
Nevada Bar No. 12493
HILARY A. WILLIAMS, ESQ.
Nevada Bar No. 14645
JACKSON LEWIS P.C.
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Telephone: (702) 921-2460
Facsimile: (702) 921-2461
Email: joshua.sliker@jacksonlewis.com
Email: hilary.williams@jacksonlewis.com

*Attorneys for Defendant
Rookies Inc. d/b/a
Rookie's Sports Bar and Grill*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

CHAD BOURNE, an individual

Plaintiff,

vs.

ROOKIES INC. D/B/A ROOKIE'S SPORTS
BAR AND GRILL; DOES I through X; and
ROE Corporations XI through XX, inclusive,

Defendant.

Case No. 3:22-cv-00521-MMD-CSD

**DEFENDANT ROOKIES INC. D/B/A
ROOKIE'S SPORTS BAR AND GRILL'S
MOTION TO EXTEND TIME TO
RESPOND TO PLAINTIFF'S
COMPLAINT**

(FIRST REQUEST)

Defendant ROOKIES INC. d/b/a ROOKIE'S SPORTS BAR AND GRILL ("Defendant"), by and through its counsel Jackson Lewis P.C., hereby brings the instant Motion to Extend Time to Respond to Plaintiff's Complaint. Defendant's response to the Complaint is currently due on February 8, 2023. Defendant seeks an extension up to and including February 22, 2023. This is Defendant's first request to extend time to file its response to the Complaint. This Motion is based on the following Memorandum of Points and Authorities, all pleadings and documents on file with the Court, and any oral argument the Court deems proper.

MEMORANDUM OF POINTS AND AUTHORITIES

I. BACKGROUND

This case appears to be an employment discrimination case brought by Plaintiff Chad Bourne ("Plaintiff") against Defendant. Plaintiff served the Summons and Complaint on Defendant

However, Defendant's counsel was only retained on February 8, 2023, the same day as the deadline to file a response to the Complaint. Defendant promptly called Plaintiff's counsel to evaluate the possibility of filing a stipulation to extend time to respond to the Complaint but was unable to reach Plaintiff's counsel.

II. LEGAL ARGUMENT

Here, there is good cause to extend the time for Defendant to file its response to Plaintiff's Complaint to February 22, 2023. Defendant's counsel is evaluating Defendant's defenses and the allegations in Plaintiff's Complaint. However, Defendant's counsel has had insufficient time to

1 investigate the allegations and prepare Defendant's response having been retained on the date the
 2 response is due. Defendant's counsel will also need time to confer with Defendant regarding the
 3 response.

4 As such, Defendant requires time to have a fair and sufficient opportunity to investigate and
 5 evaluate these matters and prepare its response. Accordingly, Defendant expressly reserves the right
 6 to assert defenses, including without limitation, motions under Fed. R. Civ. P. 12(b), as no such
 7 motion is made here and therefore none are waived. *Szanto v. Marina Marketplace 1, LLC*, No.
 8 3:11-cv-00394-RCJ-VPC, 2013 U.S. Dist. LEXIS 168028, at *10 (D. Nev. Nov. 26, 2013).
 9 Defendant has acted diligently to retain defense counsel and begin preparing its defense. No prior
 10 extensions have been requested, and this request is not made in bad faith or to delay the proceedings.

11 **III. CONCLUSION**

12 For the foregoing reasons, Defendant respectfully requests the Court grant its Motion to
 13 Extend Time to Respond to Plaintiff's Complaint up to and including February 22, 2023.

14 DATED this 8th day of February, 2023.

15 JACKSON LEWIS P.C.

16 /s/ Joshua A. Sliker

17 JOSHUA A. SLIKER, ESQ.

18 Nevada Bar No. 12493

19 HILARY A. WILLIAMS, ESQ.

20 Nevada Bar No. 14645

21 300 S. Fourth Street, Ste. 900

22 Las Vegas, Nevada 89101

23 *Attorneys for Defendant Rookies, Inc.*
 24 *d/b/a Rookie's Sports Bar and Grill*

25 IT IS SO ORDERED.

26 DATED: February 9, 2023.

27 

28 UNITED STATES MAGISTRATE JUDGE